

PSJ3

Exhibit 417

From: Freitas, Kristen
Sent: Monday, September 22, 2014 6:15 PM
To: Barber, D. Linden
Cc: Cosgrove, Jewelyn; Carl Thorsen (Carl@Thorsen-french.com); Alec French (Alec@Thorsen-french.com); Gallenagh, Elizabeth
Subject: Manufacturer issue with imminent danger definition
Attachments: 140922 prmrev Hatch Whitehouse bill section 2b2.docx

We were contacted by a manufacturer that has concerns about the definition of "imminent danger." This manufacturer has reached out to other manufacturers as well to raise concerns. We explained to the company that it was a rather excruciating process to get the definition that is in the bill now but we agreed to run their concerns by counsel.

Linden - Please let me know your thoughts on the suggestions. - is there a rebuttal to the argument that we can push back on? Or do they raise an issue that needs to be addressed?

From the manufacturer's attorney:

My suggested changes are marked up (with comments) in the attached excerpt of Section 2 (b)(2) of the bill. The first comment/change could be ignored but the second and third are, in my view, critical to protect the interests of virtually all DEA registrants, not just manufacturers.